

# JONES DAY

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September 27, 2004

Thomas Krueger  
Associate Regional Counsel  
United States Environmental Protection Agency  
Region 5  
77 West Jackson Boulevard  
Chicago, IL 60604-3590

Re: Ellsworth Industrial Park Site

EPA Region 5 Records Ctr.



265441

Dear Tom:

This letter responds to the questions posed in your September 8 message to me. Molex is eager to conclude its involvement with the Ellsworth Industrial Park site. The results of all of the soil and groundwater sampling at the Molex facilities demonstrate that they could not be contributing to the groundwater contamination at Ellsworth. This response to the issues raised in your message should help confirm the sampling results.

I believe that your question about D039 waste codes is based on a computerized manifest summary generated by the IEPA. We obtained the underlying manifests from the IEPA, and all of them identify the material as waste petroleum naphtha (D001). The only organic stream identified on the company's annual generator reports for 1991 and 1992 is waste petroleum naphtha (D001) from degreasing operations. This is consistent with EPA's Compliance Evaluation Inspection, dated July 8, 1991, which also only found a waste petroleum naphtha (D001) stream from Molex's degreasing operations. It also is consistent with the information Molex previously provided to EPA.

In preparing this letter, we discovered that Weston's August 2002 report is wrong in its discussion of Molex. The report stated that testing for TCE, PCE or TCA had not been done following the 1999 removal of a mineral spirits (naphtha) tank from the Walnut facility. This is incorrect. Follow-up samples of both soil and groundwater were taken and analyzed for various individual VOCs, including TCE, PCE or TCA. None of these substances were detected in either the soil or the groundwater. I have attached a copy of the relevant report for your information.

You also questioned the use of TCA at the Katrine facility based on information in the 1982 annual hazardous waste report. Molex has no knowledge of TCA use at Katrine beyond what is stated in the report. The information about the use of spray cans related to operations at the Walnut facility. Similarly, the two 1992 manifests with F002 waste codes were from the Katrine facility. The manifests are for the disposal of an experimental material that was not

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approved for production use. The facility did not receive an MSDS with the single shipment of the experimental material.

The manifests for the experimental material list Safety-Kleen as the receiving facility. Molex believes that Safety-Kleen tested the material and prepared the manifests based on the test results. The manifests give the material a DOT hazmat identification code of NA3082 ("hazardous waste, liquid n.o.s.," "environmental hazardous substance, liquid n.o.s.," or "other regulated substance, liquid n.o.s."). It is significant that the shipment was not given the DOT hazmat code for PCE (UN1897), TCE (UN1710) or TCA (UN2831), but rather a more general code. It also is significant that the recent sampling did not detect a TCA problem in soil or groundwater at the Katrine facility.

Please call me if you have any questions.

Sincerely,

A handwritten signature in cursive script, appearing to read "Chuck Wehland".

Charles T. Wehland